

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IOWA PUBLIC EMPLOYEES'
RETIREMENT SYSTEM, *et al.*,

Plaintiffs,

-against-

BANK OF AMERICA CORPORATION, *et al.*,

Defendants.

No. 17-cv-06221 (KPF)

**NOTICE OF MOTION TO DISMISS THE AMENDED COMPLAINT
BY EQUILEND HOLDINGS LLC, EQUILEND LLC,
AND EQUILEND EUROPE LIMITED**

Defendants EquiLend Holdings LLC, EquiLend LLC, and EquiLend Europe Limited, by and through their undersigned counsel, respectfully move this Court, at a date and time to be determined by the Court, to dismiss all claims with prejudice in the Amended Complaint, dated November 17, 2017, pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim and pursuant to Federal Rule of Civil Procedure 12(b)(2) for lack of personal jurisdiction with respect to EquiLend Europe Limited. In support of this motion, Defendants submit the accompanying Supplemental Memorandum In Support Of EquiLend Holdings LLC, EquiLend LLC, and EquiLend Europe Limited's Motion to Dismiss, dated January 26, 2018, and the Declaration of Laurence J. Marshall, dated January 24, 2018.

Dated: January 26, 2018
New York, New York

CLEARY GOTTlieb STEEN & HAMILTON LLP

/s/ David I. Gelfand

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